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March 10, 2016

VIA ELECTRONIC CASE FILING (ECF)

Hon. Steven Gold
United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Tina Morris, Administrator, etc., v. The City of New York, et al.*
Case No. 07-cv-2189 (RJD)(SMG)

Dear Judge Gold:

We are the attorneys for the plaintiff, Tina Morris, in the above-referenced matter. This letter is written in response to the Court's inquiry concerning our *ex parte* submission. Our submission was classified as a "Motion" because it seeks the Court's approval of the Judgment based on the settlement on behalf of our client. Attached is a proposed Compromise Order for the Court's consideration.

It was necessary for the plaintiff to first obtain the City's approval not to assert a lien against the settlement, thus necessitating submission at this time. After conferring with the attorney for the defendants, Matthew J. Modafferi, it appears that the City has no objection to the filing of our documents on an unrestricted basis.

Therefore, we are filing herewith the following: 1) Proposed Compromise Order 2) Affirmation of Barry E. Schulman; 3) Plaintiff's Affidavit of Status of Liens and City's letter declining to assert a lien against the proceeds of the settlement; and 4) Affidavit of sole distributee Tina Morris.

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Should the Court require additional documentation or information please do not hesitate to contact the undersigned. Thank you for your attention.

Respectfully submitted,



BARRY E. SCHULMAN

cc: Zachary W. Carter, Esq.
Office of the Corporation Counsel
Attorneys for Defendants
City of New York and New York City Police Department
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Attn: Matthew J. Modafferi, Esq.
(By ECF)